

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

KYLE COUNTS, DAMANY BROWNE, and
DENNIS MAYER, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

ARKK FOOD COMPANY, a
Michigan corporation, WAHLBURGERS I,
LLC, a Massachusetts limited liability
company, and PATRIOT PICKLE, INC., a
New Jersey corporation,

Defendants.

Case No.: 1:23-cv-00236

Hon. Lindsay C. Jenkins

PLAINTIFFS' MOTION
FOR PAYMENT OF ATTORNEYS' FEES AND REIMBURSEMENT OF LITIGATION
EXPENSES TO CLASS COUNSEL, AND PAYMENT OF
SERVICE AWARDS TO THE CLASS REPRESENTATIVES

Plaintiffs Kyle Counts, Damany Browne, and Dennis Mayer ("Plaintiffs" or "Class Representatives"), by and through Charles D. Moore from Reese LLP, and Kevin Laukaitis from Laukaitis Law LLC, Counsel for the Settlement Class ("Class Counsel"), hereby move for an order approving:

- (1) Attorneys' fees in the amount of \$750,000;
- (2) Litigation expenses in the amount of \$17,499.66; and
- (3) A \$5,000 service payment to each Class Representative for a total of \$15,000.

In support of the motion, Class Counsel submits the accompanying memorandum of law in support, and the Joint Declaration of Class Counsel in Support of Plaintiffs' Motion for Payment of Attorneys' Fees and Reimbursement of Litigation Expenses to Class Counsel and Payment of Service Awards to the Class Representatives with annexed exhibits.

Dated: July 31, 2024.

/s/ Kevin Laukaitis

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Attorneys for Plaintiffs and the Class Members

CERTIFICATE OF SERVICE

I certify that on July 31, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a Notice of Electronic Filing to all counsel of record.

/s/ Kevin Laukaitis
Kevin Laukaitis